TA

TEKNOR APEX COMPANY

Attachment "A" Question C.17:

The 1994 wastewater plant referenced in C.17 was designed to handle wastewater from the Plasticizer production processes which were shutdown in December 2003. This was a Class 5 Combined wastewater facility. After plasticizer production ended, the Biological Treatment System was shut down and the plant was regraded to Class 2I, with the approval of the Attleboro POTW and MA DEP. The majority of the wastewater facility was decommissioned, leaving the settlement lagoon and pH adjustment tank as the remaining components of the wastewater system. The lagoon has an oil/water separation system.

The Teknor Apex Attleboro Facility currently manufactures Color Concentrates and Conductive Vinyls. The three existing tanks farms are currently used for the storage of plasticizers manufactured off-site and then shipped to our Pawtucket, RI facility. The wastewater treatment plant runs 24 hours per day, 7 days per week, 52 weeks per year. Production is currently running only 5 days per week, 24 hours per day, 51 weeks per year.

The Color Department produces color concentrates for use in the plastics industry. This process involves compounding polyvinyl chloride and polyethylene resins with colored pigments, stabilizers, plasticizers and flame retardents. Raw materials are delivered via railcar and motor freight. The materials are mixed in large blenders, processed in a Banbury, rolled on a two-roll mill, cooled in contact cooling water, and diced into pellets. Some pellets are frozen in liquid nitrogen and ground into a powder. The finished products are packaged in drums and boxes and shipped to our customers.

Wastewater generation from color concentrate production includes contact cooling water and equipment/facility wash down water.

Wastewater is also generated in our plasticizer loading/unloading and storage areas. Rain water that comes in contact with these locations is sent to our wastewater pretreatment plant prior to being discharged to the Attleboro POTW.

Plant Utilities include steam, cooling water and compressed air. The cooling tower receives re-circulated water from the plant cooling water system as well as stormwater from various parts of the plant. This system requires periodic "blow down" to the wastewater plant to avoid concentrating contaminants within the system.

Steam for the plant is generated by three (3) Cleaver Brooks boilers. Two of these boilers run continuously during plant operations. The boilers must be "blown down" on a continuous basis to avoid concentrating impurities in the system. Boiler chemicals are used to inhibit corrosion in the boilers and associated equipment.

The blowdown from the cooling tower and boilers is sent to our on-site pre-treatment plant prior to discharge to the Attleboro POTW.







